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February 5, 2019

**VIA ECF**

Hon. Lewis A. Kaplan  
United States District Judge  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007-1312

**Re: United States v. Andreea Dumitru, 18-cr-243 (LAK)**

Dear Judge Kaplan:

I write to respectfully request a two to three-week adjournment of Ms. Dumitru's sentencing, which is presently scheduled for February 26, 2019. I make this request in order to prepare a more adequate and considered sentencing submission on her behalf after receipt of the final Presentence Report (PSR). I have submitted several objections and corrections to the initial PSR that have not yet been resolved by the Probation Department. A brief adjournment will allow me to incorporate the Probation Officer's final comments and avoid unnecessary argument in the sentencing submission.

In addition, I have received and continue to receive numerous letters of support for Ms. Dumitru that are written in Romanian. The additional time will afford me the ability to translate these letters for inclusion in the sentencing submission and thus provide the Court with more complete information about Ms. Dumitru for sentencing.

Lastly, as the Court is aware, Ms. Dumitru was convicted of aggravated identity theft in addition to asylum fraud and was remanded subsequent to her conviction on November 19, 2018. She is presently in custody at the Metropolitan Correctional Center. The conviction for identity theft carries a two-year mandatory minimum, consecutive to the sentence imposed by the Court. Ms. Dumitru, facing certain imprisonment, desires an opportunity to thoroughly review the final PSR and sentencing submissions in preparation for her sentencing. A two to three-week adjournment will accommodate counsel's desire to make a comprehensive submission on her behalf and her ability to prepare herself for this critical day.

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I have consulted with AUSA Robert Sobelmen and he has no objection to this request. Thank you for your consideration.

Very truly yours,

/s/Jeffrey C. Hoffman  
Jeffrey C. Hoffman

JCH: